

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:25-cr-00113-HEA-PLC
)	
)	
ROSIBEL CASTELLANOS-LOPEZ,)	
)	
Defendant.)	

**DEFENDANT'S SECOND MOTION FOR ADDITIONAL TIME IN WHICH TO FILE
PRETRIAL MOTIONS**

COMES NOW defendant, Rosibel Castellanos-Lopez, by and through counsel, Assistant Federal Public Defender, Andrew Cortopassi, and moves this Court to grant his motion for additional time in which to file Pretrial Motions. In support of this motion, counsel states the following:

1. The date for filing Pretrial Motions is June 12, 2025.
2. Defense counsel is currently in the process of collecting records, further investigating the case, and compiling legal research into the viability of pretrial motions to suppress.
3. Defense Counsel has learned from third parties that Defendant has been deported and is now living in Oaxaca, Mexico.
4. To determine whether pretrial motions will be necessary, counsel needs additional time to collect records, further investigate this case, conduct legal research, discuss the matter with defendant, and engage in discussions with the government regarding a potential disposition of this matter.
5. A continuance in this matter is in the interests of justice as it allows a reasonable time for counsel to be properly prepared pursuant to 18 U.S.C. §3161. Counsel and defendant

believe the ends of justice are served by granting defendant's motion and outweigh the best interests of the public and of the defendant in a speedy trial.

WHEREFORE, for the reasons stated above, counsel requests an extension of time, up to and including July 28, 2025, in which to file pretrial motions.

Respectfully submitted,

/s/ Andrew Cortopassi
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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2025, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Colleen Lang, Assistant United States Attorney.

/s/ Andrew Cortopassi